



## Karing Angels International Adoptions, Inc.

Where Dreams Do Come True

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A not-for-profit 501 c (3) agency  
Authorized by the State of New York

302 Virginia Avenue  
Oceanside, New York 11572 5433  
USA

22 October 2003

Re: Docket # State/AR-01/96

US Department of State CA/OCS/PRI  
Adoption Regulations Docket Room  
2201 C Street NW  
Washington, DC 20520

To whom it may concern:

I am writing in regards to the proposed accreditation that adoption agencies must soon under-go in order to continue serving families and uniting them with their children. Our agency was not around when talks of the Hague were happening. Had we been around, we probably would have been opposed as children caught up in Hague countries wind up staying there much longer than necessary. This seems to be more of a political mission than one to really protect the children. Our agency came into existence on July 26, 2000, in the state of New York. It took close to two years to complete the application, jumping over many hurdles to get to where we are today.

We are a small agency by choice, so that we can offer our families an open line of communication, which we feel, is of utmost importance to adoptive families. Larger agencies don't offer this service to their families.

I am somewhat concerned by the proposed regulations for one to become accredited and continue serving the families.

Who is to say that a person who has obtained a Master's degree is better qualified to work with families than someone who does not possess that degree? Common sense is important when dealing with families and many with higher education do not possess this, nor are they sympathetic to adoptive parents to help them through the process, which is like a roller coaster at times. Many agencies have Executive Directors who do not have a degree, yet they have compassion for the families they are working with and have brought home children for these families. Our agency started due to being a victim of an unscrupulous agency whereby we lost a huge amount of money and never brought home a child. We suffered mental anguish and we vowed we would

never have any parent experience this. We wanted to offer families affordable adoptions with a personal touch, and for the past three years we have accomplished this.

The same goes for social workers; not all have a Masters Degree, but they are excellent in their field and help to educate the families, letting them know the pros and cons of a particular country, about a certain age for a child, etc., when making their choices to adopt internationally. There are many social workers that do not prepare families; they just approve anyone just to get paid.

I have heard from agencies that became COA accredited that it was a very lengthy and expensive proposition. How is it expected that smaller agencies with less revenue will be able to afford this accreditation? Who is going to benefit with the fees collected for the accreditation? Surely, you do not think that if an agency is to spend an enormous amount of money to become accredited, that they are going to be able to keep their fees reasonable for the adoptive families? These fees will be passed along to the adoptive families, thus making adoptions even more expensive than they already are and eliminating many families from being able to pursue their dream of building a family through adoption. (Our agency keeps the fees affordable for adoptive families so their dreams can come true). Our agency helps families for the love of the children; not lining our pockets with a huge salary.

It does not make sense that one who conducts a home study will be exempt from becoming accredited, but if they do follow-up with post-placements, they must be accredited. Home studies and post-placements go hand-in-hand. How can a home study be performed and then we do not follow up with the post-placement visit(s)? (Pub.L. 106-279,3(3) and 201(b)(1). Besides being a placement agency, we also provide home studies and follow up with the post-placement visits.

Not all agencies are able to obtain liability insurance, which is a requirement to become accredited. Every state has different fees in regards to liability insurance and it is not fair that one state can provide it to agencies for a low fee, yet in another state, the fee is astronomical. This will become another enormous expense to an agency to have to obtain this insurance in order to become accredited. There are very few insurance companies who are willing to even offer a policy to an adoption agency.

What is really the reason for temporary accreditation if the agency is going to have to become fully accredited two years down the road?

Under section 96.12 it is mentioned that once the Convention has entered into force in the US, an agency may not provide adoption services unless it is either fully or temporarily accredited. What if the agency is going through the process to become accredited? What happens to the cases in the process?

Exactly what is this accreditation supposed to accomplish? Is it not enough that agencies must be licensed by their states and go through a rigorous application with rules and regulations to follow? Our state imposes on-site visitations to check our files to make certain we are following procedures. When one is a licensed agency in their state, **WHY** can't they automatically become accredited?

It is not going to be an easy task for any agency to have to meet two sets of rules and regulations; those of their state and those of the Hague. The rules of the Hague should become the rules and regulations of each state thereby having the agency become accredited in their state, automatically. Let all agencies first become temporary accredited and those who don't follow the procedures set forth by the Hague be first given a warning and then if they don't comply, their doors are closed to adoption. To have to continuously be working on applications, we will not be able to devote our time and energies into our families in helping them achieve their goal and dream of adopting a child.

How is accreditation going to ensure that agencies will walk a straight line? The larger agencies will continue to get away with all that they do. The smaller agencies are the agencies that will suffer through all this. It is being said that agencies must have a certain amount of money, in reserve, to qualify to become accredited. I hope this amount will be flexible as it is impossible for a smaller agency to have to have the same amount of funds that a larger agency would have. What is the purpose for requiring this? This won't make an agency better or worse than another.

Countries that are now Hague accredited have tapered off in adoptions and children are in orphanages and older coming home. I do not see where this will be in the best interest of the child. Where in a Hague country are the lives of the children better, and adoptions go smoothly? Also, adoption fees will rise due to the expenses an agency has to pay to become accredited. Is it fair for the adoptive family to suffer? Are adoptions only going to be geared for the rich? Will adoptions be extinct in years to come, as no one will be able to afford them? Who are going to be the accrediting bodies? Each individual state should accredit the licensed agencies in their state, all following the same guidelines as instituted by the DOS. This can be in conjunction with the licensing of the agencies in each particular state. The state licensing departments can be paid a fee by the agencies so that certain personnel can be trained to accredit the agencies. The huge cost of accreditation for the smaller agencies is going to be quite a hardship. Small agencies serve a purpose for the adoptive families who prefer a more personalized relationship while on their adoption journey. They are known by the agency they are working with and don't feel intimidated calling and asking questions or talk about concerns. Adoptive parents should have a choice as to whether they prefer to work with a large agency or a smaller, more personalized agency.

Our agency has no qualms about following procedures to ensure that adoptions are done in an ethical manner, as we pride ourselves as an ethical agency and very upfront with our families. We place what is in the best interest of the child, first and foremost. The children are our priority.

We are an agency processing adoptions for three years. We are trying to get a better understanding of just how becoming a Hague accredited country, will this improve adoptions.

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How will fees be able to stay low if agencies must spend thousands upon thousands of dollars to become accredited? Just what is the true purpose for the Hague to even be implemented? To get rid of the smaller agencies and the larger agencies will monopolize adoptions? The larger agencies that have been around for years and years are not all your better agencies. Some still have an excellent reputation, and others fall by the wayside, but continue due to the name they built for themselves years ago.

Thank you.

Yours truly,

A handwritten signature in cursive script, reading "April Coburn Viola". The signature is written in dark ink and is positioned above the printed name and title.

April Coburn Viola  
Executive Director